



March 30, 2023

Honorable Damon Smith
General Counsel
Office of Legislation and Regulations
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-05000

Re: Docket No. FR-6250-P-01
Affirmatively Furthering Fair Housing Proposed Rule
Request for an Extension of the Comment Period


Dear General Counsel Smith:


HUD has spent over 12 years developing the latest proposal for implementing the Fair Housing Act's Affirmatively Furthering Fair Housing (AFFH) requirement and has published a lengthy and complicated 75-page notice of that proposal in the Federal Register of February 9, 2023. This proposal touches on matters core to the missions and operations of local housing authorities and presents compliance challenges for those authorities. Timely, informed, and thoughtful comments from the public, stakeholders, industry associations and local housing authorities are critical to HUD's final implementation of the AFFH requirement.


The notice provides stakeholders and the public 60 days to digest this proposal, prepare comments concerning its contents and respond to 32 items about which HUD has requested comments. Those 32 items include approximately 126 individual questions. PHADA, NAHRO, CLPHA and the MTW Collaborative do not believe that a 60-day comment period is adequate to respond to HUD's proposal and offer supportive suggestions for AFFH implementation. As a result, we urge HUD to extend the comment period for an additional 60 days until Friday, June 9, 2023. Such an extension will help assure that HUD receives more complete and informed comments concerning this very important proposed rule.

Thank you for considering this recommendation.

Sincerely,


Timothy G. Kaiser
Executive Director
PHADA


Mark Thiele
CEO
NAHRO


Sunia Zatterman
Executive Director
CLPHA


Tracey Scott
President
MTW Collaborative